

# STALWART

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## LAW GROUP

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July 22, 2019

**Via ECF**

Honorable James L. Cott  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 21D  
New York, New York 10007

**Re: *Shulman, et al. v. Becker & Poliakoff, LLP, et al.*, No. 17-cv-09330**

Dear Magistrate Judge Cott:

We represent Plaintiffs in the above-referenced action. We write to request that the Court lift the current stay on discovery now that defendants' motions to dismiss have been denied and their objections to that order overruled. ECF Nos. 118, 122.

Plaintiffs further request that the Court reset the deadline to complete all non-expert discovery from November 30, 2018 [ECF No. 42] to September 27, 2019, which is approximately two months from now, because the previous deadline to complete all depositions was set for two months after the deadline to complete document production. The parties previously were ordered not to propound any additional document requests [ECF No. 104] but to date no depositions have been taken other than defendants' deposition of plaintiffs' counsel.

Plaintiffs thank the Court for its consideration of these issues.

Sincerely,



Dylan Ruga  
**STALWART LAW GROUP**